

Fill in this information to identify the case:

United States Bankruptcy Court for the:

Northern District of Texas, Dallas Division

Case number (if known) Chapter **11**

☐ Check if this an amended filing

Official Form 205

Involuntary Petition Against a Non-Individual

12/15

Use this form to begin a bankruptcy case against a non-individual you allege to be a debtor subject to an involuntary case. If you want to begin a case against a non-individual, use the *Involuntary Petition Against an Individual* (Official Form 105). Be as complete and accurate as possible. If more space is needed, attach any additional sheets to this form. On the top of any additional pages, write debtor's name and case number (if known).

Part 1: Identify the Chapter of the Bankruptcy Code Under Which Petition Is Filed

1. Chapter of the Bankruptcy Code Check one:

- ☐ Chapter 7
☒ Chapter 11

Part 2: Identify the Debtor

2. Debtor's name **AiBUY Holdco, Inc.**

3. Other names you know the debtor has used in the last 8 years
AiBUY, Inc.
a.k.a Cinsay, Inc.

Include any assumed names, trade names, or doing business as names.

4. Debtor's federal Employer Identification Number (EIN) ☒ Unknown
EIN

5. Debtor's address	Principal place of business	Mailing address, if different
	13355 Noel Road, 4th Floor Number Street	13355 Noel Road, 4th Floor Number Street
	Dallas TX 75240-0000 City State Zip Code	Dallas TX 75240-0000 City State Zip Code
	Dallas County	Location of principal assets, if different from principal place of business Number Street City State Zip Code

6. Debtor's website (URL) **www.aibuy.io**

7. Type of debtor
☒ Corporation (including Limited Liability Company (LLC) and Limited Liability Partnership (LLP)
☐ Partnership (excluding LLP)
☐ Other type of debtor. Specify:

8. Type of debtor's business Check one:
☐ Health Care Business (as defined in 11 U.S.C. § 101(27A))
☐ Single Asset Real Estate (as defined in 11 U.S.C. § 101(51B))
☐ Railroad (as defined in 11 U.S.C. § 101(44))
☐ Stockbroker (as defined in 11 U.S.C. § 101(53A))

Debtor AiBUY Holdco, Inc. Case number (if known) _____

- ☐ Commodity Broker (as defined in 11 U.S.C. § 101(6))
☐ Clearing Bank (as defined in 11 U.S.C. § 781(3))
☒ None of the types of business listed.
☐ Unknown type of business.

9. To the best of your knowledge, are any bankruptcy cases pending by or against any partner or affiliate of this debtor?

☒ No
☐ Yes. Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY

Debtor _____ Relationship _____
District _____ Date filed _____ Case number, if known _____
MM / DD / YYYY

Part 3: Report About the Case

10. Venue Check one:

☒ Over the last 180 days before the filing of this bankruptcy, the debtor had a domicile, principal place of business, or principal assets in this district longer than in any other district.
☐ A bankruptcy case concerning debtor's affiliates, general partner, or partnership is pending in this district.

11. Allegations Each petitioner is eligible to file this petition under 11 U.S.C. § 303(b).
The debtor may be the subject of an involuntary case under 11 U.S.C. § 303(a).

At least one box must be checked:

☒ The debtor is generally not paying its debts as they become due, unless they are in the subject of a bona fide dispute as to liability or amount.
☐ Within 120 days before the filing of this petition, a custodian, other than a trustee, receiver, or agent appointed or authorized to take charge of less than substantially all of the property of the debtor for the purpose of enforcing a lien against such property, was appointed or took possession.

12. Has there been a transfer of any claim against the debtor by or to any petitioner?

☒ No
☐ Yes. Attach all documents that evidence the transfer and any statements required under Bankruptcy Rule 1003(a).

13. Each petitioner's claim	Name of petitioner	Nature of petitioner's claim	Amount of the claim above the value of any lien
	Jon Gunderson	Promissory Note	\$575,075.97
			\$
	John Kutasi	Promissory Note	\$1,624,933.33
			\$
	Deposits Inc.	Trade Creditor	\$39,821.30
			\$
			\$
Total of petitioners' claims			\$2,239,830.60

If more space is needed to list petitioners, attach additional sheets. Write the alleged debtor's name and the case number, if known, at top of each sheet. Following the format of this form, set out the information required in Parts 3 and 4 of the form for each statement under penalty of perjury set out in Part 4 of the form, followed by each additional petitioner's (or representative's) signature, along with the signature of the petitioner's attorney.

Part 4: Request for Relief

WARNING -- Bankruptcy fraud is a serious crime. Making a false statement in connection with a bankruptcy case can result in fines up to \$500,000 or imprisonment for up to 20 years, or both. 18 U.S.C. §§ 152, 1341, 1519, and 3571.

Debtor **AiBUY Holdco, Inc.**

Case number (if known)

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I have examined the information in this document and have a reasonable belief that the information is true and correct.

Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner

Jon Gunderson

Name

2217 Sea Biscuit, #107

Number Street

Spicewood, TX 78669-0000

City State Zip Code

Name and mailing address of petitioner's representative, if any

Name

Number Street

00000-0000

City State Zip Code

I declare under penalty of perjury that the foregoing is true and correct.

Executed on

MM / DD / YYYY

Signature of petitioner or representative, including representative's title

John E. Mitchell

Printed name

Katten Muchin Rosenman LLP

Firm name, if any

2121 North Pearl Street, Suite 1100

Number Street

Dallas, TX 75201-2591

City State Zip Code

Contact phone **(469) 627-7017** Email **john.mitchell@katten.com**

Bar number **00797095**

State **TX**

/s/ John E. Mitchell

Signature of attorney

Date signed **09/23/2022**

MM / DD / YYYY

Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner

John Kutasi

Name

5627 Sloan Place

Number Street

Calabasas, CA 91302-0000

City State Zip Code

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Debtor **AiBUY Holdco, Inc.**

Case number (if known)

Petitioners or Petitioners' Representative

Attorneys

Name and mailing address of petitioner
Deposits Inc.

Name

2001 Ross Avenue, Suite 7001558F

Number Street

Dallas, TX 75201-0000

City State Zip Code

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Date signed

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Deposits Inc.**

Name

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Number Street

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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
AIBUY HOLDCO, INC.	§	Case No. 22-____(____)
	§	
Alleged Debtor.	§	
	§	

CORPORATE OWNERSHIP STATEMENT

Pursuant to rules 7007.1 and 1010(b) of the Federal Rules of Bankruptcy Procedures, Deposits, Inc. (“Deposits”) hereby files its Corporate Ownership Statement and states that Joseph Akintolayo is the majority shareholder of Deposits and that no other public entity directly or indirectly holds 10% or more of the equity interests of Deposits.

Dated: 9/23/22



Joseph Akintolayo
Deposits, Inc., CEO